

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA)
)
v.) Docket No. 3:13-CR-00075
) JUDGE HAYNES
JOHN SHUFORD)

**MOTION TO REMOVE CURFEW
AS A CONDITION OF PROBATION**

Comes now the defendant/probationer, JOHN SHUFORD, by and through
counsel of record, Travis Hawkins, and hereby requests to have curfew removed as a
condition of his probation.

In support, petitioner would show that he has been on supervised probation since
he was sentenced for mail fraud (18 U.S.C. § 1341 and 2) out of the United States District
Court for the Western District of Missouri October 18, 2011. Defendant's case was
transferred to this district on April 22, 2013.

Mr. Shuford was placed on probation at sentencing. As part of the judgment, he
has been subject to a curfew providing that he must be at his residence between the hours
of 10 p.m. to 6 a.m., seven days a week.

Petitioner would show that in past 21 months, he has been in full compliance with
all terms of his probation, according to supervising U.S. Probation Officer Paul
Montgomery. Accordingly, probationer respectfully moves this Court to lift the above
curfew as a condition of his probation. The supervising probation officer expressed no
opposition to the lifting of this condition.

*DKNSA
Petition for
Curfew removed
July 8, 2013
POMO
7-8-13*